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ABSTRACT

A project undertaken to field test the Institutional Report Form (IRF), a tool designed to measure the potential for student consumer abuse in postsecondary educational institutions, is described. The IRF was designed by the American Institutes for Research for use by state licensing agencies, and the field test was intended as a federal technical assistance effort. The two IRFs used in the field test (one for nondegree- and one for degree-granting institutions) were based on an intensive analysis of actual cases in which institutional conditions, policies, and practices have proved abusive to students. The IRF items were designed to determine whether or not such conditions, policies, and practices exist at respondent institutions. The following outcome measures were assessed: degree of participation by state agencies in the field test, validity of IRF field test scores, and the response of state agency and institutional representatives as revealed by followup interviews. Appendices include the 10-part IRF for degree-granting institutions, a user guide for the IRF, and a list of categories and examples of potentially abusive institutional policies and practices. Procedures used in the field test are also described. (SW)

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STATE REGULATORY AGENCY FIELD TEST

OF THE

AIR INSTITUTIONAL REPORT FORM

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U.S. DEPARTMENT OF HEALTH, EDUCATION & WELFARE
NATIONAL INSTITUTE OF EDUCATION

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INTRODUCTION

In December of 1976, staff of the American Institutes for Research (AIR) completed the development of an Institutional Report Form (IRF) designed to measure the potential for student consumer abuse in postsecondary educational institutions. The initial development and pilot testing of the form were supported by Contract 300-75-0383 from USOE*/OPBE, which sought to develop improved strategies for student consumer protection. As part of this contract, user guides (Jung, Gross, & Bloom, 1976, 1977) were prepared for state regulatory agencies and private nongovernmental accreditation agencies, both of which, along with USOE, played a role in the so-called "tripartite" system of institutional eligibility for federal student assistance programs. From July 1977 through June 1978, AIR staff conducted a field test of an IRF-based data collection and analysis system with three USOE-recognized regional accreditation agencies. As reported by Dayton and Jung (1978), the results of this accreditation agency field test were encouraging, and were the topic of a national invitational conference sponsored by USOE*'s Division of Eligibility and Agency Evaluation (DEAE) in November 1978.

In the meantime, as part of another USOE*/OPBE contract, the AIR staff was preparing an in-depth profile of the strengths and weaknesses of state agencies responsible for the authorizing and oversight of postsecondary institutions, especially as these functions act to provide protection for student consumers. The results of this study, reported in Jung, Hamilton, Helliwell, and Wheeler (1977), demonstrated great variability in the extensiveness of state licensing laws and regulations and a general dearth of investigatory and enforcement resources across the 50 states. At a 1978 national conference co-sponsored in Colorado Springs by USOE and the Education Commission of the States (ECS) and attended by representatives of most state authorizing and oversight agencies, the recommendations of Jung et al., 1977, were extensively discussed. Because of the fact that states possess the primary legal responsibility for educational consumer protection, state licensing, as almost the sole mechanism through

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* Now the Department of Education.

which this responsibility is exercised, is centrally important. A major recommendation coming from the 1978 conference was that USOE should provide technical assistance to the states in carrying out their institutional licensing functions, due to the fact that state licensing constitutes the initial step in achieving both accreditation and eligibility for federal assistance programs.

The project reported herein was conceived and funded as a means of implementing this recommendation. Its major goal was to provide the staffs of state licensing agencies with an objective and efficient tool through which they could monitor the potential for student consumer abuse in the institutions over which they exercise authority. If the goal could be achieved, it would establish a tested mechanism and a cadre of experienced state agency staff who could make possible wider adoption of IRF-based systems. The field test was thus intended as a federal technical assistance effort in immediate response to one of the major recommendations of the 1978 Colorado Springs national conference on state oversight.

The two IRFs used in the field test (one for nondegree- and one for degree-granting institutions) are based on an intensive analysis of actual cases in which institutional conditions, policies, and practices have proved abusive to students (see Appendix A). The intent of the IRF items is to determine whether or not such conditions, policies, and practices exist at respondent institutions. There is no necessary assumption that the measured presence of any particular condition, policy, or practice constitutes student consumer abuse. Rather, the assumption is that each detected case represents a potential for abuse, and that the more cases detected, the greater the potential. The critical requirements for including an item in the IRFs were:

- it related well to an institutional condition, policy, or practice that is generally agreed to be abusive (or the absence of which is generally agreed to be abusive) to students (i.e., it had face validity);
- it clearly indicated the direction of undesirability with no complex statistical transformations or unverified rationales required;
- it could be weighted, such that quantifiable scores could be produced, with higher scores representing greater potential for abuse;

- it could be verified, either through easily accessible documentation or alternate information sources;
- it could be marked without imposing an unreasonable burden on the respondent institution;
- it tapped conditions, policies, and practices which are modifiable and within the power of every instiution to modify; and
- it was at least potentially useful to an institution in its own self-study and self-improvement efforts.

The IRF scoring system is a method of obtaining the sum of the weights attached to individual items. The higher this sum, the more serious the revealed potential for abuse. Previous field tests have resulted in a rough set of norms for such scores. These exist for an overall average institution score as well as for scores on the ten individual topics contained in the IRF. These norms are presented in Table 1, in the form of an expected range of scores for a cross section of institutions. Table 1 also lists the subject of each of the ten IRF topics, the number of weighted items in each, and the maximum (worst) score possible for each.

TABLE 1

Institutional Report Form Topics, Weighted Items/Topic, Maximum Scores, and Score Ranges Expected From Cross Section of Institutions

Topics	Weighted Items	Maximum Score	Expected Range
I. Misleading recruiting and lax admissions policies and practices	18	1,440	100-400
II. Lack of necessary disclosure in written documents	39	840	50-250
III. Lack of financial assistance information	20	1,090	50-400
IV. Misrepresentation and misuse of approved and accredited status	6	1,330	0-500
V. Inequitable tuition and free refund policies and failure to make timely refunds	11	940	100-400
VI. Lack of adequate procedures to ensure qualified and stable instructional staff	13	1,625	100-500
VII. Inadequate recordkeeping practices	8	1,125	125-500
VIII. Failure to maintain up-to-date and relevant instructional programs, especially in occupational/professional preparation programs	8	2,140	250-750
IX. Lack of adequate career planning and job placement services (if promised), and lack of follow-up of former students	14	1,140	100-500
X. Financial instability	6	1,250	0-250
Institution:	143	1,130	100-300

FIELD TEST PROCEDURES

Organizational Meeting

The "State Regulatory Agency Field Test of the AIR Institutional Report Form" began officially on 1 September 1979 and lasted for one year, through August 1980. On 4 October 1979 an organizational meeting was held which brought together at AIR's Washington, D.C. office the individuals listed below:

- Steven Jung, the Principal Investigator, and Charles Dayton, the Project Director, of AIR;
- Robert Berls, the Project Officer of the Office of Evaluation and Dissemination* in the Office of Education;
- John Proffitt, Director of the Division of Eligibility and Agency Evaluation in the Office of Education;
- Richard Millard, Director of Higher Education Services for the Education Commission of the States (ECS);
- Arthur Feldman, Vice-President of the National Association of State Administrators and Supervisors of Private Schools (NASASPS);
- Wayne Freeberg, Executive Director of the Florida Board of Independent Colleges and Universities; and
- John Peterson, Chief of the California Office of Private Postsecondary Education.

The agenda for the meeting included a brief review of AIR's past work in student consumer protection, a discussion of current developments and issues which might affect the study, selection of the states to be involved as field test participants, and discussion of some of the initial project tasks and the panelists' role in them.

Sample Selection

The proposal for the study had specified the inclusion of ten states in the field test, which would meet the following criteria:

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* Now the Office of Program Evaluation.

- Even distribution across the 10 DHEW Regions.
- Adequate variance in stringency of state laws regarding student consumer protection, with some states included that have very stringent, moderately stringent and non-stringent laws respectively.
- Adequate variance in type of state agency responsible for institutional licensing, with some states included that have separate degree-granting and nondegree-granting licensing agencies and some that have a combined agency.
- Demonstrated willingness to cooperate fully with the field test, and meet all of its requirements.

Using these criteria, the advisory panel and AIR staff who were gathered at the October meeting chose the following states for participation in the field test:

USOE Region	First Choice State	Backup State
I	New Hampshire	Massachusetts
II	New Jersey	New York
III	Maryland	Virginia
IV	Florida	South Carolina
V	Ohio	Illinois
VI	Texas	Oklahoma
VII	Nebraska	Kansas
VIII	Colorado	South Dakota
IX	California	Nevada
X	Washington	Oregon

It was determined that each state would be asked to select at least ten schools (five degree-granting and five nondegree-granting) at which the Institutional Report Form (IRF) would be administered. There was some discussion of what guidelines should be provided for school selection: it was decided that correspondence, cosmetology, barbering, and religious schools should be excluded, and that otherwise a cross-section of the types of schools in the state should be sought, with perhaps more emphasis on the more numerous nondegree-granting than degree-granting institutions. It was also decided that schools currently under review could be included where possible, to save the participating states as much expense as possible.

Schedule

Once the participating states had been selected, the main tasks of the field test included: (a) contacting the agencies in these states to determine their interest in participating (October-November 1979); (b) making orientation visits to each participating state agency to detail the nature and requirements of the field test (January 1980); (c) letting each of the state agencies select the institutions for participation and complete the Institutional Report Forms for these institutions (January-April 1980); (d) making a second visit to each state agency to collect the IRF scores and the state agency representatives' reactions to the field test (April-May 1980); (e) conducting followup telephone interviews with the chief contact at each of the participating institutions to gather their reactions to the field test and the IRF (May-July 1980); and (f) tallying and analyzing all the collected data and writing the final report (July-August 1980).

Original Contacts and Orientation Visits

Contacts were made in October and November 1979 with institutional licensing agencies in each of the primary states selected. Of the ten states, two had a single agency responsible for both degree-granting and nondegree-granting schools. Counting these two agencies in both the degree-granting and nondegree-granting columns, 17 of the 20 agencies invited to participate agreed to do so (or counting them just once, 15 of 18 agencies agreed to participate). At least one agency agreed to participate in each state. Three agencies declined: the degree-granting agencies in New Hampshire and New Jersey and the nondegree-granting agency in Colorado. The New Hampshire degree-granting agency declined because of a very weak statutory responsibility for licensing degree-granting institutions in the state. The New Jersey degree-granting agency declined because of an ongoing conflict between the Commissioner of Higher Education and several private universities in the state regarding the state's role in program quality review. And the Colorado nondegree-granting agency declined because of recent staff changes, a feeling that the state's provisions for handling such problems were already adequate, a stated suspicion of federal involvement in the state's jurisdiction, and a reluctance to "police" schools.

Visits were scheduled and made by an AIR project staff member to each of the 15 participating agencies to detail the nature and purpose of the field test, the requirements for participation, and the project's schedule. The response to the field test was generally positive in these visits, and all 15 agencies confirmed their interest in participating. Agency representatives were given the suggested criteria for selection of institutions in their state, and were asked to complete their IRFs by the end of April. It was explained that AIR would ask for the IRF scores of each participating institution and a brief sketch of each such institution but would not ask for the institutions to be identified by name, and that no data would be reported by either institution or state name in the AIR report.

State Agency Efforts

Beginning in January 1980, following the orientation visits, the state agency representatives began to select schools for participation and to complete the required IRFs with these schools. The selection of schools was not random. Rather, schools were chosen to represent a cross section of those under the jurisdiction of the agency, with preference given to those being reviewed already, to ease the work of the state agency staffs. States were encouraged to vary the field test procedures to be most useful to them, with the stipulations that the IRF be fully completed and that an institution representative (or representatives) knowledgeable about the school be interviewed as a part of this process. State agency staff generally cooperated well with these stipulations, although there were a few deviations to be described later. Contacts by AIR staff were made with each participating agency between January and April to determine progress in completing the IRFs and discuss any problems.

Data Collection Visits

A second visit was made by an AIR project staff member to each of the participating agencies in April and May. During each of these visits, discussions were held regarding the reactions of the state agencies' representatives to the field test and the utility of the IRF in monitoring student consumer protection policies, practices, and conditions. The IRF scores of participating institutions were also collected, along with a

sketch of each institution (including such information as size, accreditation status, and types of programs or degrees offered), and the name and telephone number of the involved institution representative(s) for the followup telephone interview.

Follow-Up Interviews

From May through July attempts were made to contact a representative from each of the institutions that was involved in the field test. In many instances this involved several telephone calls, and even then the success rate was not 100%. Most such representatives were presidents or directors of their respective institutions, and particularly among degree-granting institutions such individuals tended to be on vacation during this period. Nevertheless, most representatives were reached. Of the 28 degree-granting institutions that participated, representatives from 19 were interviewed, or 68%. Of the 49 nondegree-granting institutions that participated, representatives from 46 were interviewed, or 94%. The combined response rate was thus 84%.

The questions asked of these representatives are essentially the ones reported in the results section of this report. They include the following:

1. How was the Institutional Report Form used in reviewing the institution/school? This refers to the simple mechanics of who filled out the form and calculated the score, from whom they gathered information at the school, the nature and length of the discussions held with the state agency representative(s), and what feedback was given to the school representative(s).

2. Did the activities involved in completing the form increase awareness of student consumer protection issues? Examples?

3. Did the review help to identify any specific problems at the school/institution? Examples?

4. (If yes to 3) Were actions taken to resolve any such problems? Examples?

5. How easy was the review process associated with completing the form, in terms of time required, ease of responding to the various items, and so on? What problems, if any, occurred in any of these respects? What suggestions could be made for improvements?

6. Would the Institutional Report Form be a useful tool for the state licensing and regulatory agency to use at other schools (i.e., more generally)? Comments?

Each of these questions was also asked of each of the state agency representatives with respect to the institutions participating under their jurisdiction.

RESULTS AND DISCUSSION

There are a number of measures of interest in reporting the results of this study. One purpose of the study, as explained in the introduction, was to determine the response of state agency representatives to the use of the IRF as a tool for monitoring student consumer abuse in the institutions over which they exercise authority. Thus one important outcome measure of the study is the degree of participation achieved among state agencies. A second outcome measure of interest is the validity of the IRF when used this way, and one way of determining this is to examine the IRF scores obtained by institutions included in the field test and to compare these scores with past results. A third and perhaps most important measure is the response to the field test and IRF by participating state agency and institution representatives as determined in the followup interviews. This "Results and Discussion" section will report the study's findings in terms of these three types of outcome measures.

Participation

The first measure of interest in this study is the reaction of state agency representatives to the field test, as measured by their responsiveness to it and the degree of effort they put forth. Simply put, how seriously did they take the field test and how much did they do with respect to it?

As reported in the previous section, 15 of the originally chosen 18 state agencies agreed to participate. Of these 15, only one degree-granting agency was unable to carry out its intent to participate at all. Two degree-granting agencies are participating but are completing their efforts too late for AIR to include the results in this report. The remaining 12 agencies have all completed their activities so that the results are included here. This means the overall participation rate is 14 of the 15 agencies agreeing to participate, or 14 of the 18 agencies originally requested to participate. Figured the first way, this gives a participation rate of 93%, and figured the second way, of 78%. If one counts just those agencies that completed their activities in time for the results to be included here, the comparable participation rates for agencies agreeing to participate and requested to participate are 80% and 67%

respectively. It might also be noted that nine out of nine of the non-degree-granting agencies completed their efforts in time for the results to be included here, while only five of eight of the degree-granting agencies did so (counting the two combined agencies in both the degree-granting and nondegree-granting columns for statistical convenience, giving 14 agencies with field test results rather than 12).

A second measure of participation is the number of schools included in the field test by each agency. The request was for a minimum of five schools per agency, whether degree-granting or nondegree-granting. The actual number included ranged from two to ten. Four of fourteen agencies included fewer than five schools, five of fourteen included exactly five, and five of fourteen included more than five (again counting the combined agency states in both columns). The average number of schools per agency was 5.5. For degree-granting agencies the average was 5.6 and for non-degree-granting agencies the average was 5.4.

A third measure of participation is the effort put forth to complete the IRF at the selected schools by those state agencies that did participate. This is a difficult variable to quantify, but is nevertheless important, and some variability did unquestionably occur along this dimension. For example, some state agency representatives organized their efforts quickly and completed their data collection well in advance of the requested end-of-April deadline. Other agencies took longer and didn't complete their work until beyond the requested deadline. Some state agency staff adopted a more serious tone than others with the schools involved, and insisted on a thorough review of the schools' policies, conditions, and practices with respect to each of the ten topics on the IRF. Other staff required less review, and viewed the form more as a self-educating checklist of issues to be considered by the schools than a monitoring device. Some state agency staff spent time checking the responses provided by schools to the IRF items, and challenged claims that seemed questionable. Other staff simply accepted the responses provided by the schools. Some state agency staff discussed the IRF scores and results of the review with school representatives; others did not. The tone and thoroughness with which the IRF completion was conducted was determined partly by the statutory authority of the state agencies, and partly by personal work styles and the type of relationship existing

between state agency representatives and their respective schools. The point here is not so much to applaud some agencies and castigate others as it is to acknowledge that variations did occur along several dimensions in the level of effort put forth by state agency representatives and in their tone toward the schools involved in the field test. These variations were generally not only permissible but desirable, and the IRF seemed to adapt well to the various state agency styles and needs.

IRF Scores

A second measure of the field test's results is the scores achieved by the participating institutions. Table 2 reports these scores, and compares them with three previous field test results of the IRF. The first of these was the original field test conducted in 1975-76 entirely by AIR staff. The second involved a 1976-77 field test conducted by the

Table 2

Comparison of IRF Institution Scores with Previous Field Test Results

	Degree-granting			Nondegree-granting		
	N	Range	Mean	N	Range	Mean
AIR Administered and Scored IRF, 1975-76	12	106-309	187	25	91-451	282
Self-Administered, DEAE Scored ISSF, 1976-77	4	69-233	127	5	89-224	161
Self-Administered and Scored ISSF, 1977-78	9	100-241	181	--	--	--
State Agency Administered and Scored IRF, 1979-80	28	50-236	144	49	26-340	156

Division of Eligibility and Agency Evaluation in which institutions themselves filled out a self-scoring version (ISSF) of the IRF and DEAE staff scored it. The third was conducted in 1977-78 in cooperation with three regional accrediting associations and also made use of a self-scoring version of the degree-granting form. The form was completed by schools

undergoing accreditation review and was scored by the schools, with later reviews by accreditation agency site visit teams. The fourth is the just-completed state agency administered field test reported herein.

A number of insights are revealed by Table 2. First, the average IRF scores achieved in this field test are consistent with earlier results. Scores in this field test are neither high enough nor low enough to raise doubts about their veracity. For nondegree-granting schools the average score of 156 in this field test is only slightly lower (better) than in the 1976-77 field test, and for the degree-granting institutions the average score of 144 falls between that from the two previous field tests. What this suggests is that the IRF was used fairly and honestly in this field test, and that the results are believable. Indeed, the decrease in scores compared with average past scores may be a legitimate reflection of improving student consumer protection practices, an interpretation supported by the level of awareness of these issues that was apparent in the followup telephone interviews.

Certain other insights can come from an inspection of the IRF scores achieved in this field test. The procedures used by state agencies to select schools for inclusion are reflected in the IRF scores. One state in particular sought out certain problem schools, and quite predictably the scores in that state were well above the average. One state had only recently enacted statutes that speak to student consumer protection in the degree-granting sector, and degree-granting institutions in that state had higher than average scores. Several states that have relatively stringent laws and enforcement procedures, and that did not purposely include problem schools, had relatively low scores.

One possibility considered for reporting IRF scores was direct state-by-state comparisons. This proved to be impractical for several reasons. As mentioned previously, school selection procedures were not random, and there was a certain competitiveness on the part of some state agencies, a quite natural desire to do well in comparison with other states. It is impossible to know to what degree this factor may have affected school selection and therefore IRF scores in any given state. In addition, the jurisdiction of state agencies varied considerably from state to state. Not only was there a single agency responsible for both degree-granting and nondegree-granting institutions in two states, unlike the other eight,

but within several states publicly supported institutions came under a different jurisdiction than private institutions, whether the latter were degree-granting or not. Some states had a very urban makeup, others very rural, with attendant differences in student populations and program offerings, further confusing attempts at comparison. In short, the representation of postsecondary institutions varied along so many dimensions from state to state and agency to agency that it seemed unfair and imprecise to attempt direct comparisons, however interesting these might have been in some respects.

Followup Interview Results

Perhaps the clearest and most substantive data on the results of the field test come from the responses of institution and state agency representatives in the followup interviews. These interviews, conducted by telephone, lasted an average of 10 to 15 minutes each, and were structured around the six questions listed earlier. To briefly recap these, they include:

- How was the IRF used by the agency and institution?
- Whether/how was awareness of student consumer protection issues increased?
- Whether/what specific problems were identified at the institution(s)?
- What actions were defined to solve any such problems?
- Reactions to the ease of use of the IRF and field test procedures, problems in this respect, and suggestions for improvements.
- Whether the IRF should be used more widely by the state agency?

The one institution representative most responsible for completion of the form was interviewed in each case, as was the one state agency representative most responsible for that agency's work in the field test. There were 65 individuals in the former category and 13 in the latter.

The first question dealt with the way in which the IRF was completed and used at each institution. This matter has been discussed already. As

reported, considerable variation did occur from state to state, but all state agencies that finished their efforts did satisfactorily complete the IRF, and did calculate and report the institution scores.

The second question asked whether the respondent experienced increased awareness of student consumer protection issues as a result of completing the IRF. Responses to this question were divided into three categories: "yes," "noncommital," and "no." The "noncommital" category was necessary to accommodate the occasional respondent who refused to be categorized as primarily affirmative or negative or who qualified a response to the degree it was neither a clear "yea" nor "nay." Results are broken out by degree-granting and nondegree-granting institution and agency representatives.

Increased Awareness

	Yes	Non-Committal	No
All Institution Representatives	29	3	33
Degree-Granting	10	1	8
Nondegree-Granting	19	2	25
All State Agency Representatives	4	3	6
Degree-Granting	2	1	2
Nondegree-Granting	2	2	4
All Respondents	33	6	39
Degree-Granting	12	2	10
Nondegree-Granting	21	4	29

As can be seen, feeling was fairly evenly split on this issue, with institution representatives slightly more positive than state agency representatives and degree-granting representatives slightly more positive than nondegree-granting representatives. Many of the positive respondents commented that the IRF served as a useful focus for the issues about which they should be concerned, or pointed to one or several of the topics in the form as something that had not occurred to them previously. Many of the negative respondents commented that they were already very familiar with these issues, and while the IRF touched on a broad cross section of

the important issues, they could not in honesty say any of these issues were new to them. The fact that nondegree-granting schools have been generally more closely monitored in the past with respect to these issues probably accounts for the slightly lower ratio of positive respondents among them. A wider familiarity of the issues among state agency representatives is to be expected, and probably accounts for the slightly lower ratio of positive responses among them.

The third question asked whether specific problems were identified at the particpating institution(s). Using the same categories as in the second question, the reponses were as follows:

Problems Identified

	Yes	Non-Committal	No
All Institution Representatives	21	0	44
Degree-Granting	9	0	10
Nondegree-Granting	12	0	34
All State Agency Representatives	4	5	4
Degree-Granting	2	2	1
Nondegree-Granting	2	3	3
All Respondents	25	5	48
Degree-Granting	11	2	11
Nondegree-Granting	14	3	37

This display shows that only about one-third of the respondents interviewed felt any specific problems requiring attention had been identified at their institution(s). The most common explanation given for this was that the institution officials were aware of and attending to these issues already. There may have been a reluctance to admit to "problems" in those areas where points were scored. Most respondents quite naturally defended and identified with their institution. In fact, however, no institution scored a zero, and most were within the expected range, suggesting at least some room for improvement. Perhaps the fairest conclusion is that about one-third of participating institutions discovered what they perceived as problems requiring attention, given their setting and context.

For both question two and three, when interviewees felt they had increased their awareness or identified a problem, examples were asked for. The examples tended to overlap between the two questions; it was often those topics about which respondents gained awareness from the IRF that they had not previously attended to. There were a number of patterns among these examples. The most frequent problems came from the IRF's second topic, "Disclosure in Written Documents." Catalogs of many institutions were found to have gaps in information, with examples including the lack of a distinction between part-time and full-time instructors and an out-of-date listing of those instructors actually teaching, an out-of-date and inaccurate description of the curricula, including the frequency and cycling of courses, and the transferability of credit. A second frequently mentioned topic was the need for a written recruiting policy and clear rules governing recruiting and admissions practices. Another common problem was lack of faculty evaluation by students and/or frequent faculty turnover. Other examples included poor followup of graduates and dropouts, poor career planning and placement services, lack of written student grievance procedures, and lack of timely refunds.

The fourth question asked whether actions had been defined to deal with problems mentioned in question three (if any). In almost all cases some action was being taken. Where the problem involved gaps in catalog information, catalogs were being revised. One state agency representative indicated that the state model catalog was being revised in line with weaknesses identified by the IRF. Where the problem involved a particular area of institution responsibility, the individual responsible for that area had been contacted and was working on a solution. In general, institutions seemed responsive toward problems uncovered by the IRF.

Skipping the fifth question briefly, the sixth question asked whether the IRF should be used more widely by the state agency. Results here were:

Wider IRF Use

	Yes	Non-Committal	No
All Institution Representatives	37	15	13
Degree-Granting	12	3	4
Nondegree-Granting	25	12	9
All State Agency Representatives	2	8	3
Degree-Granting	1	4	0
Nondegree-Granting	1	4	3
All Respondents	39	23	16
Degree-Granting	13	7	4
Nondegree-Granting	26	16	12

These data indicate a strongly positive reponse to the IRF, particularly among institution representatives, where the positive responses outnumber the negative ones almost three to one. This seems somewhat curious, given the smaller number of respondents who felt either that their awareness had been increased by the IRF or that they had identified specific problems through its use. In effect, the predominant attitude was that the form served as a comprehensive and efficient self-check, and even when such an exercise does not turn up problems it is worthwhile.

The relatively large number of "noncommittals" to this question was due to the frequent qualifications attached to a response. Many individuals felt the form would be useful if employed a certain way (such as a self-check) but not another (such as an investigatory instrument), or with certain institutions (such as nonaccrediated or new ones) but not with others (such as established, accredited ones). It was these many qualifications that led to the higher number of noncommittal responses to this question, particularly among state agency representatives, who tended to be well-informed and thoughtful about this question.

Returning now to question five, the responses will be structured slightly diffently. This question asks about the ease of use of the IRF, any problems encountered, and any suggestions for improvements in either the form or field test procedures. Responses to the form will be listed in three categories: "positive," "mixed," and "negative." The number of

respondents citing either problems or suggestions for improvements will also be listed. The nature of comments received will then be discussed.

Reactions to the IRF

	Positive	Mixed	Negative	Problems	Suggestions
All Institution Representatives	46	17	2	20	29
Degree-Granting	13	6	0	7	9
Nondegree-Granting	33	11	2	13	20
All State Agency Representatives	7	6	0	9	9
Degree-Granting	3	2	0	4	4
Nondegree-Granting	4	4	0	5	5
All Respondents	53	23	2	29	38
Degree-Granting	16	8	0	11	13
Nondegree-Granting	37	15	2	18	25

These data again show a positive reaction to the IRF. Almost no clearly negative reactions to the form itself were found. Many respondents commented that they had been pleasantly surprised by the form, which seemed lengthy at first and yet proved easy to use. All the following adjectives describing the IRF were mentioned by respondents: straightforward, reasonable, efficient, thorough, clear, comprehensive, and relevant. One state agency representative commented that it was the "best questionnaire I have ever used." Respondents were asked how long it took to complete the form; most indications were between one-half and two hours.

Each interviewee was specifically asked to cite any problems they had encountered in using the form; 29 of 78 identified at least one. Some interviewees expressed negative feelings about "government questionnaires" in general, and saw the IRF as an example. Some respondents felt the form overlapped with other reviews (accreditation, existing state reviews, Veteran's Administration, or CETA) too much, and added little or nothing to existing reviews. Problems were indicated in fitting the form to a particular school that was perhaps small (and had less in writing than a large school) or large (and found it diffcult to provide one response when many programs or "schools" were being referred to) or had some unique

characteristic that made some of the items irrevelant. Some respondents objected either to the tone of the questions, which they found too negative or "investigatory," or to their transparency, the fact that the "right" answer to most items is easy to ferret out. Additional comments focused either on specific topics (e.g., "the financial health section needs strengthening") or individual items that were found difficult to interpret or hard to answer fairly.

The suggestions for improvements provided by respondents tended in general to be solutions to the problems they felt were present. Thus many of the comments here parallel those above. However, there were two patterns that emerged as more general responses to the field test. The first of these involved how best to administer the IRF. A few respondents, for example, found the state agency representative's presence in the field test as threatening. More frequently, respondents commented that they liked this presence, that the state agency representative had handled the interview very professionally, and that without some personal followup the form and review might be taken less seriously or ignored altogether. Several institution representatives commented specifically that they liked the interview approach, as opposed to the endless questionnaires they received in the mail. And there was widespread agreement that the self-study approach was preferable to a monitoring or investigatory approach. Institution representatives would much rather be appealed to in terms of their natural desire to do what is best for students than to be viewed suspiciously by an external authority.

The second pattern of suggestions concerns the type of institution for which the IRF seems best suited. Institutions which were accredited, well established, and which had gone through regular accreditation and state agency reviews in the past generally found the IRF least useful. Most often respondents in this category did not feel their awareness of student consumer protection issues had been increased by the IRF review, and very few respondents in this category identified any problems requiring attention at their institutions. Contrastingly, respondents at institutions which were relatively new, were nonaccredited, or for any other reason had not gone through regular reviews previously were most apt to find the IRF review instructive and helpful. One state agency was in the process of rewriting the rules for regular review in the state and found

the IRF field test useful in that effort. Interest was also shown in using the form to review out-of-state schools operating in a state, a growing category that may not receive the regular reviews given to in-state schools. In a sense the field test thus defined the "potential audience" for the IRF, those categories of institutions most likely to find the form useful. This information should prove valuable in planning for future use of the form.

CONCLUSIONS AND RECOMMENDATIONS

A number of conclusions emerge from the findings of this study. Perhaps the first that should be discussed is a growing awareness of and attention to consumer protection issues in the postsecondary education community. A combination of factors has contributed to this, including: (a) the increased involvement of regional and national accreditation agencies in looking at consumer protection issues; (b) tougher regulations on the part of the new ED Office of Student Financial Assistance with regard to enforcing limitation, suspension, or termination of eligibility for the Higher Education Act (HEA) student aid programs and new mechanisms of federal compliance monitoring for these programs; (c) the FTC's proposed Trade Regulation Rule for proprietary schools; and (d) national conferences focused on student consumer protection, such as the one held in 1978 at Colorado Springs, Colorado. This conference, co-sponsored by USOE* and the Education Commission of the States, examined in particular the oversight practices of state agencies responsible for licensing and regulating institutions in their states. It is evident that this conference produced impetus for constructive changes in many states.

This growing awareness and concern is reflected in the findings of the present study. A comparison of the results of this field test and the one conducted in 1977-78 in cooperation with three regional accrediting agencies helps to illustrate this. Of the respondents in that study, 67% felt their awareness of student consumer protection issues had been increased through use of the IRF; the comparable figure in this study was 42%. On the question of whether specific problems had been identified from the IRF review, 40% of the respondents in that study responded positively, compared with 32% in this study. The IRF scores in this study also showed a decline over the 1977-78 study, and in fact their general trend in four field tests since 1976 has been downward (better). Comments received from respondents also reinforce this conclusion. State agency representatives in particular often commented that much progress had been made in the past five years with respect to this issue. All this is encouraging, and holds implications for future IRF use.

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* Now the Department of Education.

Related to the increased responsiveness to student consumer protection issues on the part of the postsecondary educational community is the responsiveness shown in this field test by state agency representatives to the use of the Institutional Report Form. AIR had relatively little to offer these representatives to provide them with an incentive to participate in the field test, other than use of the form and direct and immediate access to the study's findings. The field test involved time, energy, and expense for these individuals. Yet all 10 states and 15 of 18 agencies agreed to participate (and two of the three that declined did so for quite understandable reasons), all but three of these completed their efforts on time, and two of the remaining three seem intent on doing so in the near future. The most important common ingredient in this widespread voluntary support seemed to be a willingness to cooperate with a legitimate effort to assess and improve student consumer protection practices in postsecondary educational institutions. This optimistic conclusion should perhaps be qualified by noting that not all state agencies included the requested number of schools in their field test (although the average exceeded this number), and that some agencies worked harder than others to assure a thorough review of involved schools through use of the IRF. But such variations are to be expected in any real-world experience. The level of voluntary cooperation and commitment was in fact high, and there is now a body of state agency representatives familiar with the IRF, at least some of whom plan to use it further. The results of the technical assistance effort intended through the project, if not an unqualified success, are certainly encouraging.

A third conclusion that emerges from this study involves a definition of the "audience" for which the IRF seems best suited. The User Guide that accompanies the IRF (see Appendix B) already speaks to this question to some degree. Based on past field tests, it recommends the IRF for use at campus-based, undergraduate, nonreligious schools, especially vocational and technical schools, two- and four-year colleges with occupational and professional preparation orientations, proprietary schools and programs, out-of-state schools and programs, and military base schools. None of these recommendations were contradicted in the latest field test, and all but the last two were reconfirmed. In addition, the IRF seems most appropriate for use at new schools, nonaccredited schools, and any

other schools that don't already undergo a regular review which covers student consumer protection issues. With respect to IRF use at degree-granting versus nondegree-granting institutions, the former have lower (better) average scores, and by their nature are often less prone to student consumer abuses. Contrastingly, most nondegree-granting schools have been more thoroughly examined with respect to these issues, and their representatives have a generally higher level of awareness of possible problems. These two factors seem to balance each other, suggesting that use of the IRF at either type of institution can be appropriate.

A fourth conclusion emerging from this study relates to the most useful type of administration of the IRF. This can range from a pure self-check in which the state agency simply sends the form to school officials and lets them complete and score it, with no information on the results given back to the state agency, to a thorough review of an institution done by the state agency, including examination of the institution's public documents, interviews with all appropriate administrators, scoring of the form by the state agency, and follow-up discussions and monitoring to assure that action is taken to resolve any problems that are identified. There is clearly room for much variation in IRF use along the spectrum defined by these two poles, in line with the statutes, enforcement practices, and preferred styles of various states and their agency representatives. The approach that seemed favored by most respondents in this field test, however, came distinctly toward the self-check end of this spectrum, and allowed institution officials to identify and respond to problems based on their natural desire to do well by students, rather than on their fear of external officials threatening them with statutory authority and legal strictures. Used as a self-check, the IRF is essentially an educating tool for institution officials, sensitizing them to the many and often subtle ways in which an institution can abuse a student. Very few of the respondents in this study seem opposed to use of the IRF in this way, even if it is initially introduced by a state agency representative.

Finally, response to the IRF itself was strongly positive in this field test. Sixty-eight percent of respondents had clearly positive reactions to the form, while only three percent had clearly negative reactions (the remaining twenty-nine percent being noncommittal). Furthermore,

fifty percent of respondents expressed a feeling that the IRF should be used more widely, while twenty-one percent were opposed to this (with twenty-nine percent again noncommittal). These data argue that the IRF should be used more widely, particularly with the categories of schools defined as most appropriate, and particularly when administered as essentially a self-check educational tool for institution officials. We recommend strongly that the Department of Education support wider use of the IRF along these lines.

In addition, the spirit of organized state involvement in the system of institutional eligibility for federal student assistance programs must be rekindled. This involvement, which is the source of federal interest in state licensing and oversight, was initiated at the 1978 Colorado Springs Conference (ECS, 1978) but has not been followed up. Since state licensing, as the first prerequisite for eligibility, represents the primary and first line of defense against student consumer abuses, minimal federal investments to support more organized state participation are justifiable and would be cost effective.

These investments could take several forms. We mention here some that have been suggested previously. The Department of Education (DEAE or the Office of Student Financial Assistance or, preferably, both) should sponsor a national conference with representation sought from the state licensing and oversight agencies in all states and insular areas. This conference should seek to come up with an action agenda for practical steps the federal government could take to enhance state student consumer protection functioning. Possible mechanisms might include a federally-sponsored clearinghouse and communications center for sharing information among state agencies, such as news of legal actions taken by one state against institutions that might be operating across state lines. Another mechanism might be the provision of further technical assistance in the development and use of the IRF system field tested in this project, especially for states with new oversight agencies or staff.

With or without a national conference, the Department should immediately assign one agency the responsibility for initiating and maintaining a continuing liaison with state licensing and oversight agencies and their national organizations (e.g., NASASPS, SHEEO). This liaison would focus attention on the important role played by state agencies in protecting

students as educational consumers, perhaps providing information on new federal eligibility regulations and institutional monitoring systems which state cooperation might enhance.

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October 1979

APPENDIX A

INSTITUTIONAL REPORT FORM

FOR

DEGREE-GRANTING *

POSTSECONDARY INSTITUTIONS

Name of Institution: _____

Date Completed: _____

Completed by: _____

*See note inside cover.

*The Nondegree-Granting Institutional Report Form differs slightly from the Degree-Granting Form presented here, specifically in Topics I, II, and IX. Two items need to be added in Topic I, as follows:

7. Does the school employ admissions representatives whose compensation or salary is based wholly or in part on commissions? Mark <u>one</u> response.

No	Yes
[0]	[2]

8. If yes, how are these commissions calculated? Mark <u>one</u> response for each option.

No	Yes		
[0]	[6]	a.	They are based on the number of students enrolled.
[0]	[4]	b.	They are based on the number of students enrolled who actually attend classes.
[0]	[0]	c.	They are based on the number of students enrolled who graduate.

In Topic II, Items 1p and 1s (page 4) and Item 6 (page 6) need to be deleted. In Topic IX, Items 2b-2d (page 20) and Item 4 (page 21) need to be deleted. In all other respects, the two forms are parallel.

Instructions for completing the Institutional Report Form (either version) are contained in Appendix B, the User Guide.

I. STUDENT RECRUITING POLICIES AND PRACTICES

1. Does the institution use the following techniques in attracting applicants for admission? Mark <u>one</u> response for each lettered item.

	No	Yes		Weights
21	[0]	[4]	a. Contracting with a private recruiting firm or consultant organization, or employing individuals to stimulate enrollments, when all or any part of the payment is contingent on the number of result-applications for admission.	1a.____
22	[0]	[4]	b. Classified ads in the "Help Wanted" section of the newspaper, <u>not</u> for jobs at the institution, but to obtain applications for admission.	b.____
23	[0]	[2]	c. Competitions or contests designed only to stimulate applications for admission.	c.____
24	[0]	[2]	d. Published or oral testimonials or endorsements by persons who did not attend the institution.	d.____
25	[0]	[2]	e. Offers of limited time discounts on tuition charges, room and board charges, etc.	e.____

2. Does the institution make the following statements in any of its recruiting efforts? Mark one response for each lettered item.

	No	Yes		
26	[0]	[2]	a. Completing the education or training offered at this institution is likely to lead to employment, without accurate supporting data.	2a.____
27	[0]	[2]	b. Completing the education offered at this institution is likely to lead to admission to graduate or professional school, without accurate supporting data.	b.____
28	[0]	[2]	c. There are ties or connections between this institution and specific employers which will result in special employment considerations for graduates, when this is <u>not</u> the case.	c.____
29	[0]	[4]	d. Scholarships or other forms of no-cost financial assistance are available, when in fact none have been awarded during the past year.	d.____
30	[0]	[2]	e. The educational program at this institution is superior to the educational program offered at competing institutions.	e.____
31	[0]	[2]	f. Recognized experts or other types of well-known persons are on the undergraduate teaching faculty, when they have no undergraduate teaching responsibilities.	f.____

Weights

3. Does a responsible administrative officer of the institution review recruiting materials before they are used? Mark one response

32 [6] No. — 3.____
[2] Some or most of them.
[0] All of them.

33-36 blank

4. Does the institution follow a written policy which governs all recruiting practices? Mark one response for each lettered item.

	No	Yes		
37	[6]	[0]		4.____

If you filled in "no" to item 4 above, skip item 5 and go on to item 6.

5. Does the institution's written recruiting policy specify or contain a reference to the following items? Mark one response for each lettered item.

	No	Yes		
38	[2]	[0]	a. A code of ethics which prohibits certain recruiting practices.	5a.____
39	[2]	[0]	b. A requirement that prospective students talk to a staff member of the institution before enrolling.	b.____
40	[0]	[0]	c. The completion of an enrollment agreement signed by an institutional staff member and the applicant that describes all costs, payment requirements, and educational services to be provided by the institution.	c.____

6. For students who are admitted under an "open" admissions policy, or who do not meet stated admissions requirements but are admitted under a "special" admissions policy, are the following courses provided? Mark one response for each lettered item. If the institution does not practice "open" admissions or does not allow underqualified applicants to be admitted, omit this item.

	No	Yes		
41	[2]	[0]	a. Courses or sections offering remedial instruction in basic English.	6a.____
42	[2]	[0]	b. Courses or sections offering remedial instruction in mathematics.	b.____
43	[2]	[0]	c. Special academic tutoring programs offering remedial instruction related to students' needs.	c.____

Total of Topic I Weights

II. DISCLOSURE IN WRITTEN DOCUMENTS

1. Does the institution disclose information on the following items in its general catalog, bulletin, basic public information document, or a combination of these? Mark one response for each lettered item.

	No	Yes			Weights
44	[1]	[0]		a. Name and address of institution.	1a.____
45	[1]	[0]		b. Date of publication of the document.	b.____
46	[1]	[0]		c. Institutional calender, including beginning and ending dates of classes and programs, holidays, and other dates of importance.	c.____
47	[1]	[0]		d. A statement of institutional philosophy or mission and program objectives.	d.____
48	[1]	[0]		e. A brief description of the institution's physical facilities as related to the instructional program.	e.____
49	[1]	[0]		f. An accurate list of all courses actually offered, or all subject areas actually taught if separate courses do not exist.	f.____
				↓ There are no required courses (N/A).	
50	[2]	[0]	[NA]	g. An indication of when specific required courses will normally be offered.	g.____
51	[1]	[0]		h. Educational content of each course, or of the program if separate courses do not exist.	h.____
52	[1]	[0]		i. Number of hours of instruction in each course, or in the program if separate courses do not exist, and length of time in hours, weeks, or months normally required for its completion.	i.____
53	[1]	[0]		j. An accurate listing of instructional staff who currently teach.	j.____
				↓ No such distinction exists (N/A).	
54	[1]	[0]	[NA]	k. An indication of the distinction between adjunct or part-time faculty and full-time faculty.	k.____
55	[1]	[0]		l. Policies and procedures regarding acceptability or non-acceptability of credits from other institutions.	l.____
56	[2]	[0]		m. General acceptability or non-acceptability by other institutions of credits earned at this institution.	m.____

	No	Yes			Weights
57	[2]	[0]		n. Requirements for graduation.	n.____
58	[1]	[0]		o. Statement of certificates or diplomas awarded upon graduation.	o.____
59	[1]	[0]		p. Statement of degrees awarded upon graduation.	p.____
60	[2]	[0]		q. Data regarding numbers and characteristics of students who drop out of this institution before their graduation.	q.____
				This institution has no undergraduate occupational/professional preparation programs (N/A)	
61	[1]	[0]	[NA]	r. Data regarding the employment success of students who graduate from this institution's undergraduate occupational/professional preparation programs.	r.____
				This institution has no graduate occupational/professional preparation programs (N/A).	
62	[1]	[0]	[NA]	s. Data regarding the employment success of students who graduate from this institution's graduate occupational/professional preparation program.	s.____
63	[1]	[0]		t. Grading system.	t.____
				Policies relating to:	
64	[1]	[0]		u. Excessive late-arrival for classes.	u.____
65	[1]	[0]		v. Absences.	v.____
66	[1]	[0]		w. Make-up work.	w.____
67	[1]	[0]		x. Student conduct.	x.____
68	[1]	[0]		y. Termination/withdrawal.	y.____
69	[1]	[0]		z. Re-entry after termination/withdrawal.	z.____

2. There are often <u>standard legal</u> limitations or requirements for employment in certain occupations. Examples include medical or health requirements, professional licensing or certification requirements, additional apprenticeships, further training by employers, membership in or registration by a professional organization, and so on. If the institution offers any programs to prepare students for such occupations, are these limitations disclosed in basic public information document(s)? Mark <u>one</u> response:

70 [4] Such standard legal limitations or requirements are <u>not</u> disclosed. 2.____

[0] Such standard legal limitations or requirements <u>are</u> disclosed.

[NA] There are no standard legal limitations or requirements for post-training employment opportunities for students at this institution (N/A).

Weights

3. If the institution lacks specialized or professional course accreditation which is normally required for post-training employment of students, is this lack disclosed in public information document(s)? Mark one response.

71 [4] The lack of specialized accreditation is not disclosed. 3.____

[0] The lack of specialized accreditation is disclosed.

[NA] Specialized or professional course accreditation is not required for post-training employment of students who complete courses of study offered at this institution, or all courses requiring specialized accreditation are so accredited (N/A).

4. Does the institution provide an accurate description of the steps students should take in the event they feel they have a valid complaint or grievance against the institution, a program, or a member of the faculty or staff? Mark one response.

72 [6] There is no complaint or grievance policy. 4.____

[2] There is a complaint or grievance policy, but it is not described.

[0] The complaint or grievance policy is described.

5. Does the institution provide accurate descriptions of the availability and extent of the following student services in its basic public information document(s)? Mark one response for each lettered item.

	No	Yes	No service of this type exists at this institution (N/A).		
73	[1]	[0]	[NA]	a. Job placement service or assistance.	5a.____
74	[1]	[0]	[NA]	b. Student counseling for academic and personal problems.	b.____
75	[1]	[0]	[NA]	c. Food service facilities (excluding vending machines).	c.____
76	[1]	[0]	[NA]	d. Housing facilities.	d.____
77	[1]	[0]	[NA]	e. Parking facilities.	e.____

Weights

6. Does the institution provide accurate descriptions of the following institutional conditions or procedures regarding the award of degrees? Mark one response for each lettered item.

	No	Yes			Weights
				No State agency exists for this purpose (N/A).	
78	2	0	NA	a. Recognition or lack of recognition by a State agency as meeting established educational standards for granting degrees.	6a.____
79	4	0		b. Scope and sequence of required courses or subject areas in each degree program.	b.____
				There is no transfer between departments and/or colleges (N/A).	
80	2	0	NA	c. Requirements, policies, and procedures regarding transfer between departments and/or colleges within the institution.	c.____

7. Are increases in tuition or any student fees exceeding $50 currently planned for the next year? Mark one response.

	No	Yes			Weights
				This institution charges no student fees (N/A).	
81	0	0	NA		7.____

If you filled in "No" or "N/A" to item 7 above, skip item 8 and go on to item 9.

8. Are all planned tuition and/or fee increases exceeding $50 disclosed in writing to all students and prospective students to whom they might apply? Mark one response.

	No	Yes	Weights
82	4	0	8.____

9. Do the public representations of the institution clearly indicate (and distinguish between, where applicable) institutional accreditation, institutional memberships in professional organizations, specialized or professional program accreditation, State VA-approving agency course approval, and State licensing and approval? Mark one response.

	No	Yes			Weights
				No representations as to approvals or accreditation are made (N/A).	
83	6	0	NA		9.____

Total of Topic II Weights

III. FINANCIAL ASSISTANCE INFORMATION

Weights

1. Does the institution make readily available to all current enrollees and applicants written documentation of the costs of attending the institution, including the following? Mark <u>one</u> response for each option.

	No	Yes	No such fees or charges exist at this institution (N/A).		Weights
84	[4]	[0]	[NA]	a. Tuition and fees.	1a.____
85	[2]	[0]	[NA]	b. Books and supplies.	b.____
86	[2]	[0]	[NA]	c. Estimates of room and board costs on campus and in the surrounding community.	c.____
87	[2]	[0]	[NA]	d. Estimates of transportation costs for students who live in the surrounding community.	d.____
88	[2]	[0]	[NA]	e. Any additional significant costs of programs (for example, uniforms).	e.____

2. Does the institution participate in <u>any</u> Federal or federally-supported program of financial assistance to students, <u>excluding</u> veterans' benefits through the VA? Mark <u>one</u> response.

	No	Yes		Weights
89	[0]	[0]		2.____

If you filled in "No" to item 2 above, skip the following two items and go on to item 5.

3. Does the institution, through publications and mailings, make readily available to all current enrollees and applicants upon request up-to-date information describing <u>Federal</u> assistance programs, including the following? Mark <u>one</u> response for each option.

	No	Yes		Weights
90	[2]	[0]	a. Types of programs available (loans, grants, etc.) and amounts of aid <u>actually</u> available through each program.	3a.____
91	[2]	[0]	b. How applications for this aid are made, including requirements for accurately preparing an application.	b.____

	No	Yes		Weights
92	2	0	c. Limitations on eligibility for these programs, or instructions on how to obtain this information.	c.____
93	2	0	d. Review standards (criteria) used by the institution in making awards.	d.____
94	2	0	e. The method of disbursement of this aid.	e.____
95	2	0	f. The person(s) available to assist students or potential students in obtaining information regarding student financial assistance programs, and the means for contacting those persons.	f.____
96	2	0	g. How and where students may voice complaints and grievances regarding financial assistance programs.	g.____

4. Do all applicants for student loans (excluding short-term or emergency loans) receive printed documents from the institution which disclose their rights and responsibilities, including the following, before any repayment obligation begins? Mark one response for each option. Omit this item if the institution offers no student loans except short-term (i.e., under 30 days) or emergency loans.

	No	Yes		
97	4	0	a. The effective annual loan or deferred fee interest rate.	4a.____
98	4	0	b. Loan or deferred fee repayment obligations.	b.____
99	2	0	c. The process for repayment of the loan or deferred fee.	c.____
100	2	0	d. The length of time allowed for repayment of the loan or deferred fee.	d.____
101	2	0	e. The procedure for renegotiating the repayment schedule for the loan or deferred fee.	e.____
102	2	0	f. Procedures for deferment or cancellation of portions of the loan or deferred fee, if necessary.	f.____
103	2	0	g. Procedures for loan or deferred fee collection which will be used in the event of failure to repay.	g.____

5. Does the institution employ any of the following? Mark one response for each option.

	No	Yes		
104	0	0	a. Part-time financial aid counselors under (Federal) work-study programs.	5a.____

	No	Yes		
105	[0]	[0]	b. Part-time financial aid counselors from the community.	b.____
106	[0]	[6]	c. Commissioned solicitors to promote the availability of Federal student assistance programs.	c.____

Total of Topic III Weights

IV. REPRESENTATION OF CURRENT APPROVED OR ACCREDITED STATUS

Weights

1. Is the institution currently on suspension, probation, or some other form of limitation or sanction for noncompliance with designated standards by any of the following government agencies? Mark one response for each lettered item.

	No	Yes		
107	[0]	[2]	a. A local government agency (for example, Consumer Protection Agency, District Attorney, etc.).	1a.____
108	[0]	[2]	b. A State government agency (for example State Approving or Licensing Agency, Attorney General, etc.).	b.____
109	[0]	[2]	c. A Federal government agency (for example, Federal Trade Commission, Department of Education, etc.).	c.____

If you filled in "No" to all of the above options, skip item 2 and go on to item 3.

2. Is the fact that the institution is under some form of limitation(s) or sanction(s) publicly disclosed in writing to all current enrollees and applicants? Mark one response.

No	Yes	
110 [4]	[0]	2.____

3. Is the institution currently on suspension, probation, or some other form of limitation or sanction for noncompliance with designated standards by any institutional or professional accreditation agency which is recognized by the U.S. Commissioner of Education or the Council on Postsecondary Accreditation? Mark one response.

No	Yes		This institution is not accredited (N/A)	
111 [0]	[2]	[NA]	↓	3.____

If you filled in "No" or "N/A" to item 3 above, skip the next item and go on to the next section, Refund Policies and Practices.

Weights

4. Is the fact that the institution is under some form of limitation(s) or sanction(s) publicly disclosed in writing to all current enrollees and applicants? Mark one response.

No Yes

112 [4] [0]

4._____

Total of Topic IV Weights

V. REFUND POLICIES AND PRACTICES

Weights

1. Does the institution require students to pay or otherwise obligate themselves to pay any of the following fees or charges before enrollment or class attendance? Mark one response for each lettered item.

	No	Yes	No such fees or charges exist at the institution (N/A).		
113	0	0	NA	a. Resident (in-State, etc.) tuition or tuition generally applicable to all students.	1a.
114	0	0	NA	b. Non-resident (out-of-State, etc.) tuition or tuition paid only by certain groups of students.	b.
115	0	0	NA	c. Room and board charges or deposits.	c.
116	0	0	NA	d. Application or registration fees exceeding $50.	d.
117	0	0	NA	e. Other required fees exceeding $50 (excluding books).	e.

If you marked "No" or "N/A" to all the options above, skip the following three items and go on to the next section, Instructional Staff Evaluation and Stability.

2. Does your institution have a written refund policy regarding all those fees for which "Yes" was checked in item 1? Mark one response.

	No	Yes		
118	6	0		2.

If you filled in "No" to item 2 above, skip the following two items and go on to the next section, Instructional Staff Evaluation and Stability.

Weights

3. How is the written refund policy made available to students? Mark <u>one</u> response for each lettered item.

	No	Yes			Weights
119	[2]	[0]	a.	It is made available for public inspection at the institution.	3a.____
120	[2]	[0]	b.	It is printed in the institution's general catalog or bulletin.	b.____
121	[4]	[0]	c.	It is distributed to all <u>enrolled</u> students (free or at a cost not exceeding $2).	c.____
122	[4]	[0]	d.	It is distributed to all <u>prospective</u> students (free or at a cost not exceeding $2).	d.____

4. Does the institution's written refund policy clearly specify the following items? Mark <u>one</u> response for each lettered item.

	No	Yes			
123	[4]	[0]		a. Those fees and charges which are <u>not</u> refundable.	4a.____
124	[2]	[0]		b. All conditions which students must meet to obtain refunds.	b.____
125	[4]	[0]		c. How to properly apply for a refund.	c.____
				This institution collects no tuition in advance (N/A).	
126	[2]	[0]	[NA]	d. A tuition refund formula by which students pay only for the instruction made available to them.	d.____
127	[0]	[4]		e. Any non-refundable application processing fee or other type of non-refundable student fees exceeding $100.	e.____
128	[2]	[0]		f. A time limitation not exceeding 40 days between receipt of a valid refund request and the issuance of a refund.	f.____

Total of Topic V Weights

VI. INSTRUCTIONAL STAFF EVALUATION AND STABILITY

Weights

1. Is teaching competence (no matter how evaluated) included as one criterion in the formal salary and/or tenure and/or rank review policies of the institution? Mark one response.

	No	Yes		
129	[6]	[0]	[4]	This institution has no institution-wide salary/tenure/rank review policies. These decisions are left solely to the discretion of the individual departments or other academic programs.

1._____

2. Is teaching competence systematically evaluated by the following groups at the institution? Mark one response for each lettered item.

	No	Yes		
130	[2]	[0]	a.	By administrative staff of the same department or program.
131	[2]	[0]	b.	By other instructional staff of the same department or program.
132	[4]	[0]	c.	By students.
133	[1]	[0]	d.	By graduates of the institution.
134	[1]	[0]	e.	By instructional staff self-ratings.

2a._____

b._____

c._____

c._____

e._____

If you filled in "No" to "By students" in item 2 above, skip the following two items and go on to item 5.

3. Are student evaluations of instructional staff members conducted on a regular basis (for example, yearly, at the end of each course, etc.)? Mark one response.

	No	Yes
135	[2]	[0]

3._____

If you filled in "No" to item 3 above, skip the following item and go on to item 5.

Weights

4. Does the system of evaluation of instructors by students include the following provisions? Mark one response for each lettered item.

	No	Yes			Weights
136	[1]	[0]		a. Anonymous student responding.	4a.____
137	[1]	[0]		b. Objective student responding (for example, on machine scored answer sheets).	b.____
138	[1]	[0]		c. Evaluations of all regularly appointed faculty members.	c.____
				There are no adjunct faculty members (N/A).	
139	[1]	[0]	[NA]	d. Evaluations of all adjunct faculty members (for example, temporary appointments).	d.____

5. During the previous calendar year, how often did an unscheduled, permanent change of instructor occur after instruction had begun (for reasons other than illness or death of the original instructor)? Fill in the number; if none, enter as zero.
Number of times: _____

6. The number in item 5 above represented what percentage of the total number of instructors teaching during that calendar year? Mark one response; if none, enter as zero.

	[0]	Zero.
	[0]	Less than one percent.
	[2]	One to two percent.
	[4]	Three to five percent.
140	[6]	Six or more percent.

6.____

7. During the previous calendar year, did any unscheduled, permanent change of instructor occur in the same course or subject area twice or more often after instruction had begun? Mark one response.

No	Yes	
141 [0]	[4]	7.____

Total of Topic VI Weights

VII. RECORDKEEPING PRACTICES

1. Are individual student records maintained that contain the following items? Mark one response for each lettered item.

	No	Yes	NA		Weights
				No fees are charged by this institution (N/A).	
142	2	0	NA	a. Total fees paid by the student.	1a.____
143	2	0		b. Courses taken and completed or subject matter covered by the student.	b.____
				No internships or supervised practice are offered by this institution (N/A).	
144	2	0	NA	c. Internships or other forms of supervised professional practice.	c.____
145	2	0		d. Academic credits, grades, or indicators of satisfactory progress earned by the student.	d.____
				No financial aid is offered by this institution directly (N/A).	
146	2	0	NA	e. Financial aid awards, including loans, received by the student directly from the institution.	e.____
147	2	0	NA	f. Bases for demonstration of: (a) student's eligibility for financial aid and (b) calculation of award.	f.____
148	2	0	NA	g. Identification of officers who determined each student's eligibility and calculated his/her award.	g.____

2. Does this institution have a written policy for maintaining, or arranging for maintenance of, individual student access to records for a period of at least five years in the event of the institution's closure or change in ownership? Mark one response.

	No	Yes	
149	4	0	2.____

Total of Topic VII Weights

VIII. OCCUPATIONAL-PROFESSIONAL PREPARATION PROGRAMS

Weights

Omit this section if the institution has no occupational/professional preparation programs.

1. Does the institution maintain and utilize advisory committee(s) on curriculum content and equipment? Mark one response.

   [6] No.

   [2] For some of the occupational/professional preparation program areas offered at this institution.

150 [0] For all occupational/professional preparation program areas offered at this institution. 1._____

If you filled in "No" to item 1 above, skip item 2 and go on to item 3.

2. Do these committee(s) include representatives of potential employers? Mark one response.

   [4] No.

   [2] For some of the occupational/professional preparation program areas offered at this institution.

151 [0] For all occupational/professional preparation program areas offered at this institution. 2._____

3. Do all of the occupational/professional preparation programs in the institution possess specialized/professional accreditation, if it is a requirement for the employment of graduates in those occupations or professions? Mark one response.

	No	Yes		
152	[4]	[0]	[NA]	Specialized/professional accreditation is not required for any position in any occupation or profession for which the institution provides preparation (N/A).

3._____

Weights

4. Do all of the occupational/professional preparation programs in the institution provide training in the use of basic tools and equipment, if it is a requirement for the employment of graduates in those occupations or professions? Mark one response.

No Yes NA

153 [4] [0] [NA]

Training in the use of basic tools and equipment is not required for any position in any occupation or profession for which the institution provides preparation (N/A).

4._____

5. Do all of the occupational/professional preparation programs in the institution provide for internships and/or supervised practice on the job, if they are required for the employment of graduates in those occupations or professions? Mark one response.

No Yes NA

154 [4] [0] [NA]

Internships and/or supervised practice on the job are not required for any position in any occupation or profession for which the institution provides preparation (N/A).

5._____

6. Do all of the occupational/professional preparation programs in the institution provide for internships and/or supervised practice in simulated job situations, if they are required for the employment of graduates in those occupations or professions? Mark one response.

No Yes NA

155 [4] [0] [NA]

Internships and/or supervised practice in simulated job situations are not required for any position in any occupation or profession for which the institution provides preparation (N/A).

6._____

7. Do all of the occupational/professional preparation programs in the institution provide for instruction on topics necessary for State or professional certification in this State, if certification is a requirement for the employment of graduates in those occupations or professions? Mark one response.

No Yes NA

156 [4] [0] [NA]

State or professional certification in this State is not required for any position in any occupation or profession for which the institution provides preparation (N/A).

7._____

Weights

8. Does the institution require reviews of the relevance and timeliness of all of its occupational/professional preparation curricula and instructional equipment at least once every two years? Mark one response.

No Yes

157 [4] [0]

8._____

Total of Topic VIII Weights

IX. CAREER PLANNING AND PLACEMENT SERVICES AND FOLLOW-UP OF GRADUATES

Weights

1. Does the institution state that it offers placement services or other assistance to students in finding jobs or planning careers? Mark one response.

	No	Yes		Weights
158	0	0		1.____

If you filled in "No" to item 1 above, skip item 2 and go on to item 3.

2. Does the career planning and placement assistance offered by the institution include the following aspects? Mark one response for each lettered item.

	No	Yes		Weights
159	0	2	a. A fee for the assistance.	2a.____
160	2	0	b. Professional counseling for career planning and choice.	b.____
161	2	0	c. Testing to facilitate personal assessment in relation to career opportunities.	c.____
162	2	0	d. A resource center which includes information on various career opportunities and educational and training institutions and programs.	d.____
163	2	0	e. Formal training in job-seeking and job-holding skills.	e.____
164	2	0	f. Seeking out and contacting prospective employers about potential job openings.	f.____
165	2	0	g. Making job interview appointments for individual students.	g.____
166	0	2	h. Referral to a commercial placement service which charges a fee.	h.____
167	2	0	i. Assistance in finding a part-time job.	i.____

Weights

3. Does the institution systematically collect data on the employment success (however defined) of persons in its occupational and/or professional preparation programs? Mark one response for each lettered item.

	No	Yes	This institution currently has no occupational or professional preparation students or graduates (N/A).		Weights
168	2	0	NA	a. Former students who did not graduate.	3a.____
169	4	0	NA	b. Recent graduates (within one year of graduation).	b.____
170	2	0	NA	c. Recent graduates (from one to five years of graduation).	c.____

4. Does the institution systematically collect data on the success of its graduates in obtaining admission to graduate or professional training programs? Mark one response.

	No	Yes	This institution currently prepares no students for graduate or professional training.	
171	2	0	NA	4.____

5. Does the institution systematically collect data on the numbers and characteristics of students who drop out of the institution at the time they leave or soon thereafter? Mark one response.

172	4	No, or only sporadically
	2	Yes, for all students enrolled in occupational and/or professional preparation programs or majors.
	0	Yes, for all enrolled students regardless of program or major.

5.____

Total of Topic IX Weights

X. FINANCIAL STABILITY

Weights

1. Is this a publicly-supported institution (that is, receives over 50% public funding)? Mark one response.

	No	Yes	
173	0	0	1.____

If you filled in "Yes" to item 1 above, skip the following four items and go on to the Additional Comments page.

2. Are the central financial records and reports of the institution regularly audited or inspected as follows? Mark one response for each lettered item.

	No	Yes		
174	0	0	a. Uncertified audit by an accounting firm.	2a.____
175	4	0	b. Certified audit by an accounting firm.	b.____
176	2	0	c. Inspection by a State regulatory or auditing agency.	c.____
177	2	0	d. Inspection by a Federal regulatory or auditing agency.	c.____

3. Does the institution have a retained earnings fund, an endowment, or other reserve of funds or source of income to pay current operating expenses not covered by current student tuition receipts? Mark one response.

	No	Yes	
178	4	0	3.____

4. Do the financial reporting practices of the institution report unearned tuition as assets, without indicating an offsetting liability? Mark one response.

	No	Yes	
179	0	4	4.____

Weights

5. Does the institution have debts or other outstanding repayment obligations exceeding $50,000 which are more than 90 days delinquent? Mark <u>one</u> response.

No Yes

180 [0] [4]

5._____

Total of Topic X Weights

ADDITIONAL COMMENTS

Please write additional comments in the space below. If the comment is on specific items, be sure to include the section and item number.

Section and Item Number	Comment

General Comments

SCORE SHEET

Both topic scores and overall institution scores can be computed on this page. To compute a topic score:

1. Write down the sum of weights recorded at the end of each topic.
2. Divide each sum by the number of items answered in that topic. Each number listed in the weights column (including zeros) represents an item. Multiply each quotient by 500. This is the topic score.

To compute an overall institution score:

1. Add all ten sums of weights.
2. Divide this sum by the total number of items answered.
3. Multiply this quotient by 500. This is the overall score.

The form below can be used to make these computations.

Topic Scores

Topic	(Sum of Weights ÷ Items Answered)	x 500 =	Topic Score
I	____ ÷ ____		____
II	____ ÷ ____		____
III	____ ÷ ____		____
IV	____ ÷ ____		____
V	____ ÷ ____		____
VI	____ ÷ ____		____
VII	____ ÷ ____		____
VIII	____ ÷ ____		____
IX	____ ÷ ____		____
X	____ ÷ ____		____

Overall Institution Score

(Sum of All Weights)	÷ (Total Number of Items Answered)	x 500 =	Overall Institution Score
____	____	x 500	____

APPENDIX B

USER GUIDE

FOR THE

INSTITUTIONAL REPORT FORM

October 1979

This document was prepared pursuant to Contract 300-79-0389 from the Office of Evaluation and Dissemination, U.S. Office of Education, U.S. Department of Health, Education, and Welfare. The opinions expressed, however, do not necessarily reflect the position or policy of the sponsor, and no official endorsement by the sponsor should be inferred.

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Introduction

A number of developments in recent years have led to an increased awareness of certain problems students may face in dealing with postsecondary educational institutions. Certain blatantly abusive practices at a few schools have been exposed in the press. Increased numbers of complaints from students have been received by various government agencies. A growing tightness in the "supply" of traditional college-age youth has created a sharpened competition among institutions for this supply; a greater potential exists for misleading youth through overly aggressive recruitment practices. Such problems have increasingly come to be classified under the rubric of student consumer abuse, and the attempts to prevent such problems have conversely been referred to as student consumer protection.

In the past, the federal government (through student financial assistance program eligibility requirements) and private accreditation agencies (through the self-study process aimed at improving educational quality) have often joined with state licensing agencies to represent an interacting network designed to protect students from unfair practices. Within this triad, the states have traditionally dealt with most matters concerning consumer protection. A recent research study (Jung et al., 1977) surveyed the laws and enforcement mechanisms which address this issue. The recommendations of this study and the July 1978 Colorado Springs Conference (organized by USOE and the Education Commission of the States (ECS) to review and consider the study's findings) called for increased attention to student consumer protection by the state licensing agencies. The ECS model state legislation developed in 1973 also speaks to this concern.

The Institutional Report Form (IRF), developed and field tested in a previous research study (Jung et al., 1976), is a tool that provides a means of assessing an institution's potential for student consumer abuse. Developed from an analysis of student complaint files, with an eye toward separating legitimate, serious abuses from lesser problems, the IRF provides a means of checking an institution on a series of conditions, policies, and practices found to be related to the protection of students. Past field tests have shown

this instrument to be valid, reliable, and useful in a variety of settings.

Inasmuch as state licensing agencies are primarily responsible for matters related to student consumer protection, and inasmuch as the IRF is a tool which directly addresses this role, the instrument is being made available to such agencies, to be tried out and adapted or adopted as found desirable. The purpose of this User Guide is to explain the nature and purpose of the IRF as they pertain to state agency use. Thus the sections that follow explain how the IRF works, and how it can be useful to state licensing agencies.

Background

Definition of Student Consumer Protection

In an effort to define precisely the nature of student consumer abuse, AIR staff undertook a comprehensive search of the literature, which included: (1) the records of hearings conducted by subcommittees of the U.S. House of Representatives' Committee on Education and Labor and Committee on Government Operations; (2) reports published by the Education Commission of the States as a result of two national conferences on student consumer protection; (3) a report published by the U.S. Office of Education (USOE) as a result of a national conference on institutional eligibility for federal student assistance programs; (4) the 40-plus-volume file put together by the staff of the Federal Trade Commission in support of their proposed trade regulation rule for proprietary vocational and home study schools; (5) the student complaint files of USOE's Accreditation and Institutional Eligibility Staff (now the Division of Eligibility and Agency Evaluation [DEAE]); and (6) over 60 other sources (see Helliwell & Jung, 1975). In general, AIR sought to identify institutional policies and practices which had the potential to mislead students and frustrate their efforts to obtain a quality education. Several decisions were made that should be made explicit here.

Students are consumers. Some authors have contended that students, as participants in the educational process, are not "consumers" in the true sense of the word. While we do believe that a good deal of the responsibility for learning during any educational experience rests with the student, it is clear that some school practices deprive the student of even an opportunity to learn; furthermore, some practices are so blatantly fraudulent and unfair that they would be abusive regardless of the product or service that was being offered. To the extent that schools do market an educational service, students are the consumers.

Student consumer protection is not the same as better student decision making. Numerous calls have been registered for systems to assist students in making better decisions about postsecondary education. Such calls usually include requests for disclosure of better information on the course options, social climate, financial aid, and so on, available at an institution, plus

providing students with an insight into the world of work and the student's own goals, interests, and abilities. Information of this type is no doubt an aid to student decision making. However, such information is not the same as information about institutional practices which can abuse students. The limited set of information useful for providing better "student consumer protection" should be carefully distinguished from the much larger set required to facilitate "better student decision making"; this distinction can help avoid much unnecessary confusion and effort.

The Major Kinds of Student Consumer Abuse

Through an analysis of the conditions which led to well-documented abuses of students, AIR staff identified a set of institutional conditions and practices that seemed to have the highest potential for abuse. In this analysis, we took into account the fact that postsecondary students are quite capable of excessive subjectivity, deception, and of making unfair complaints which are not the result of institutional causes. The types of valid, potentially abusive conditions and practices that were identified are listed in Table 1.

Table 1

TYPES OF POTENTIALLY ABUSIVE INSTITUTIONAL CONDITIONS AND PRACTICES

1. Misleading recruiting and lax admissions policies and practices.
2. Lack of necessary disclosure in written documents.
3. Lack of financial assistance information.
4. Misrepresentation and misuse of approved and accredited status.
5. Inequitable tuition and fee refund policies and failure to make timely refunds.
6. Lack of adequate procedures to ensure qualified and stable instructional staff.
7. Inadequate recordkeeping practices.
8. Failure to maintain up-to-date and relevant instructional programs, especially in occupational/professional preparation programs.
9. Lack of adequate career planning and job placement services (if promised), and lack of follow-up of former students.
10. Financial instability.

The listed conditions and practices are clearly those which are designed to mislead students, endanger students' opportunity to receive the promised educational services, or deny students proper recourse. No doubt there are other potentially abusive practices, and in the course of our literature we discovered many of them. The ones we selected, however, represented, in our judgment, the set that was most dangerous to students and most easily detectable without recourse to excessive subjectivity (e.g., "the administrators are not of 'good moral' character"); or excessive expense (e.g., "the school is not 'bonded' for X dollars"); or unproven theses (e.g., "the school does not provide a 'cooling off' period for students at the end of which their enrollment is cancelled unless they reaffirm their intention to attend" or "does not have evidence that 51-plus percent of its graduates are working in 'training related' jobs").

The types of potential abuses listed in Table 1 are further expanded in Appendix A. Note that all the potential abuses detailed here are stated negatively--in other words, they are stated as aspects of an institution that, if present, will increase the probability that student abuse may occur.

Note also that the measure under investigation is "potential for abuse," not actual abuse. No attempt is being made to directly gauge actual student abuse. The pointing of accusatory fingers at allegedly guilty parties does little to work toward constructive improvement. We hope that the identification and quantification of institutional policies and practices related to student consumer abuse will lead to such improvement.

The presence of one or more potentially abusive conditions or practices does not automatically indicate that student abuse is occurring or will occur in the future at an institution. In fact, in a survey of 37 institutions conducted by AIR staff in early 1976, none was completely free from potential for abuse. Moreover, some conditions and practices hold considerably less potential for abuse than others. But the more conditions and practices listed in Appendix A that are found to be present, and the more serious they are, the greater the probability that actual abuses will occur. All, however, are modifiable and within the power of an institution to modify without excessive cost.

The Institutional Report Form

An Institutional Report Form (IRF) has been developed by AIR to provide a convenient yet reliable mechanism for detecting the presence of potential abuses and quantifying the seriousness of those that are revealed. Two versions of the form are available--one for degree-granting postsecondary institutions and one for nondegree-granting postsecondary schools. The IRF is structured for use as an interview guide, to direct the questions of state regulatory agency staff who are present at the institution being assessed. IRF completion requires an interview with institutional administrators and an examination of certain institutional policy statements, records, and public dissemination and disclosure materials. The interview and examination require approximately two hours, depending on the obtained responses.

All of the items on the IRF are in an objective, multiple-choice format; they are grouped into ten topics in accordance with the ten types of potential abuses listed in Table 1 and expanded in Appendix A. The ten topics are:

1. Student Recruiting Policies and Practices
2. Disclosure in Written Documents
3. Financial Assistance Information
4. Representation of Current Approved or Accredited Status
5. Refund Policies and Practices
6. Instructional Staff Evaluation and Stability
7. Recordkeeping Practices
8. Occupational/Professional Preparation Programs
9. Career Planning and Placement Services and Follow-up of Graduates
10. Financial Stability

The critical requirements for each item on the IRF are:

- it relates well to an institutional practice or policy which is generally agreed to be abusive (or the absence of which is generally agreed to be abusive) to students;

- it clearly indicates what practices are undesirable, with no complex statistical transformations required;
- it can be weighted, such that quantifiable scores can be produced for each of the ten topics;
- it can be verified, either through easily accessible documentation or alternate information sources;
- it can be marked without imposing an unreasonable burden on either the source institution or the collecting agency;
- it taps policies and practices that are modifiable and within the power of an institution to modify; and
- it is at least potentially useful to an institution in its own self-study and self-improvement efforts.

As a result of these requirements, items on public disclosure or minimum acceptable levels of school dropout rate, withdrawal rate, and/or graduate placement rate are specifically not included. Such rates, even if they could be calculated accurately and at reasonable cost, are very difficult to interpret meaningfully. For example, almost no definitive evidence exists to support the simple hypothesis that abusive institutions have higher dropout and default rates or lower placement rates than nonabusive institutions. The evidence that is available does suggest that dropout, default, and placement are much more a function of the socioeconomic status, initial employment status, motivation, and employability of entering students. These variables are not within the power of an institution to control, unless it uses discriminatory admissions standards which may be considered unacceptable and even unlawful.

Each item response option has an associated weight that indicates the perceived seriousness of the response. These item weights can be summed and averaged to provide scores for each of the ten topics and the overall IRF. The higher these scores, the greater the revealed potential for abuse. A perfect score (no revealed potentials) would be zero. Again, however, no institution is expected to be totally free from potential for abuse, and zero scores are unlikely.

Rationale for Topics and Items

The underlying rationale for each topic and many individual items on the IRF is described below. For rationales specific to one version of the form,

a "DG" appears in parentheses for the "degree-granting postsecondary institutions" version and a "NDG" for the "nondegree-granting postsecondary schools" version. To make this discussion more meaningful, refer to the forms themselves in using this section of the guide.

I. Student Recruiting Policies and Practices

Intensified recruiting is being used more frequently to increase enrollments. Unfair recruiting practices may occur when false, misleading, or unsubstantiated claims are made, whether or not this is intentional. All institutions or schools which use the mails or public media or make personal contacts with potential students in attempting to attract enrollees should be aware that certain specific practices (which are in fact illegal in a number of states) involve a potential for abuse. The Chief Executive Officer of an institution or school should be responsible for the recruiting practices of that institution or school. If recruiting is carried out without that officer's review, especially by personnel who stand to gain from increased enrollment, there is a higher probability that questionable practices will result.

Items 4 and 5 (DG) and items 4-7 (NDG): With a shrinking pool of students available for enrollment, recruiting practices may expand to help fill the vacuum. If the line dividing fair from unfair practices has been carefully thought out and written down in advance, abusive practices can usually be avoided. Such guidelines particularly need to be brought to the full attention of recruiters.

Item 6 (DG) and item 8 (NDG): If an institution or school has an essentially "open" admissions policy, it should also have remedial services to assist students with special needs. Failure to do so may be taking unfair advantage of certain students under the pretense of "giving them an opportunity."

II. Disclosure in Written Documents

Lack of adequate disclosure by an institution or school can be intentional or unintentional. If it is intentional and students are misled to their detriment, the result may be considered consumer fraud. Much more common are situations in which lack of adequate disclosure is unintentional, and students

make important decisions based on faulty or no information. All institutions or schools should, as a routine policy, disclose certain important facts, both to prospective students and already enrolled students. Students should not have to exert unreasonable effort to seek out these facts, which should be written clearly, in plain English, and made readily available free or at a cost not to exceed the cost of their publication. Note that the items under this topic do not ask whether particular conditions or services exist at the institution or school, but whether their existence or nonexistence is adequately disclosed in public documents.

Items 7 and 8 (DG) and items 6 and 7 (NDG): With rising costs, increases in tuition and fees are unavoidable. But such increases should be made known well in advance to all students whom they will affect.

Item 9 (DG) and item 8 (NDG): There are many types of approval and accreditation with which students are generally unfamiliar. Nevertheless, their future may be affected by the type enjoyed by the institution, school, or program they attend. The exact nature of an institution's or school's approval or accreditation should be made clear to all prospective and enrolled students. Special care should be exercised to ensure that memberships in organizations are not listed so as to imply that the institution or school has been inspected and approved by these organizations.

III. Financial Assistance Information

The Federal Government and many state governments have provided educational financial assistance to millions of needy students. Countless others have been denied this help through simple lack of information. Many who have benefitted have understood dimly--if at all--the provisions of this aid, and their own related responsibilities. A full and open flow of information on financial assistance programs, detailing not only their availability but the mechanisms by which they operate, is necessary for them to serve students fairly and impartially, and in turn to be used responsibly. This information should be readily available, free or at a cost not to exceed the cost of publication, to all potential beneficiaries of such assistance. Under the Education Amendments of 1976, disclosure of this information is required of eligible schools which seek to recover costs of administering financial aid programs.

IV. Representation of Current Approved or Accredited Status

Students should be accurately informed about the actual status of an institution or school or their programs with regard to State approval, private accreditation, and any pending legal actions. It is the responsibility of the institution or school to disclose and not to misrepresent this information. Misrepresentation may cause students to believe an institution or school has been evaluated and is completely approved, when in fact this is not the case.

V. Refund Policies and Practices

Institutional or school failure to refund tuition and other fees collected in advance is one of the most common causes of student complaints. It is recognized that institutions or schools are justified in requiring advance tuition and fee payments and in retaining a portion of these payments to cover processing and other fixed costs. However, it is generally agreed that all institutions or schools: (1) should have a written refund policy stating clearly when and under what conditions refunds will be granted, (2) should make timely refunds to students who abide by stated institution or school policy, and (3) should make the policy available to all students in advance of their attendance at the institution or school.

Item 4: There are aspects of a refund policy that are desirable for all institutions or schools which collect fees in advance. Students need to know when they qualify for a refund and how they must apply for it. Also, students should be able to assume that institutions or schools will process valid refund requests within a reasonable period of time. Institutions or schools should avoid large nonrefundable application or processing fees, and should never assess such fees without ample advance notice to students.

VI. Instructional Staff Evaluation and Stability

Unqualified and unmotivated staff provoke many student complaints. Certain steps, particularly in the form of structured student evaluation, can be taken to evaluate and improve instructional staff and should be carried out as a matter of policy. Furthermore, one of the most disturbing experiences for students is the turnover of instructional staff during a course, resulting in a loss of essential continuity. Excessive staff instability should be avoided if at all possible.

VII. Recordkeeping Practices

Institutions or schools which do not maintain accessible student records make it extremely difficult for current and former students to obtain them when needed. Moreover, if an institution or school closes or merges with another institution or school, lack of a record maintenance policy can cause great inconvenience and even abuse of current and former students.

VIII. Occupational/Professional Preparation Programs

There is no intent under this topic to directly assess the quality of an institution's or school's instructional program. The intent is rather to gather descriptive indicators of practices that are viewed as essential for the maintenance and improvement of quality. In the occupational/professional preparation program area, students (and employers) generally expect training to result in certain specific outcomes, particularly in terms of qualifications and abilities necessary to enter a given occupational field. If the institution or school does not take definite steps to see that these outcomes are achieved by its graduates, it is in danger of malpractice. Although there is no definitive catalog of such steps, practices about which there is consensus are noted under this topic. Omit this section of the IRF if the institution or school has no occupational/professional preparation programs.

Items 1 and 2: Institutions or schools lacking advisory bodies tend to insulate themselves and their curricula from current practices and technology in business, industry, and government, and in so doing they jeopardize the chances of their students for placement in jobs appropriate to the training.

IX. Career Planning and Placement Services and Follow-Up of Graduates

Two related topics are actually covered here. If institutions or schools do not claim to offer career planning and placement service or assistance, it is of course not mandatory that they do so. If such assistance is offered, it should consist of certain essential services. Regardless of whether or not placement assistance is offered, follow-up of graduates and alumni is essential as a method for evaluating the relevance and effectiveness of an institution's or school's educational program. Sampling and new follow-up techniques make such studies a possibility for all institutions and schools.

Item 2: Genuine placement assistance or service performs at least the minimal functions of job placement (contacting prospective employers regarding possible openings), training in job-seeking and maintenance skills, and scheduling interviews for students, for both part-time and full-time jobs. Career planning assistance should include counseling, testing, and resources and activities designed to familiarize students and graduates with career and educational opportunities (DG).

Item 3: With the efficiency of modern sampling and follow-up techniques, even lack of a large budget is no reason for not trying to collect some data on employment success, the ultimate desired outcome of occupational and professional preparation programs.

X. Financial Stability

It is very difficult to either measure or guard against financial instability in a postsecondary institution or school, as many regulatory bodies have discovered too late. However, certain practices are more likely than others to ensure that institutions or schools do not close, leaving students with no way to obtain either the instruction they paid for or a refund.

Sources of Information for Completing the IRF

Most IRF items are in the form "Does this institution have/do this?" The easiest way to complete the IRF is to locate the person knowledgeable about each topic, ask the items, and record his or her responses. Complications arise when recollections are vague, policies are "usually" followed but exceptions are allowed, qualifications are required based on different or unusual circumstances, and so forth. The safest stance, and the one which will yield the most accurate data, is to obtain and review documentation or secondary verification for all items about which there is any question. Table 2 presents a listing of possible sources of information for each topic in the IRF.

Table 2

SOURCES OF INFORMATION FOR IRF COMPLETION

	Topic	Sources
I.	Student recruiting policies and practices	Admission officer Admission policy statements Institutional advertising
II.	Disclosure in written documents	General catalog, bulletin or other public information documents
III.	Financial assistance information	Financial aid officer
IV.	Representation of approved or accredited status	Public information officer Chief administrative officer Public information documents
V.	Refund policies and practices	Chief financial affairs officer Public information documents
VI.	Instructional staff evaluation and stability	Chief executive and/or academic affairs officer Department heads
VII.	Recordkeeping practices	Registrar Records office
VIII.	Occupational/professional preparation programs	Chief academic affairs officer Department heads Chief administrative officers for occupational/professional preparation programs.
IX.	Career planning and placement services and follow-up of graduates	Placement officer Director of institutional research services Public information documents Advertising
X.	Financial stability	Chief executive officer Chief financial affairs officer Financial statement

Instructions for Completing the IRF

The IRF contains ten sections. For each section, score the institution or school on each of the items by checking the appropriate box or boxes. A sample item follows to illustrate the correct procedure.

1. Is teaching competency systematically evaluated at the institution?
   Mark one response.

   No Yes

   [6] [7]

Some questions call for just one response and some for a series of responses. Scoring can then be done by hand or by computer. Directions for both procedures follow in the Data Analysis section.

Whenever possible, each item in the IRF should be marked; an attempt has been made to provide "Not Applicable" response options in each case where an item might prove inappropriate for an institution or school of limited size or educational purpose. These options should always be used in preference to omitting an item. Missing responses can prove to be very troublesome during the analysis of IRF data. If you cannot fairly provide a response for one of the options, omit that item and give a brief reason for the omission in the "Additional Comments" section at the end of the IRF. Ommitted items are neither weighted nor included in the scoring.

Data Analysis

Interpreting IRF Scores

Table 3 shows the maximum (worst-possible) score for each topic score and the institution score derived from the IRF. Since the best possible scores are zero, all scores may range from zero up to the maximums indicated. Table 3 also contains the range of scores expected to be obtained by a cross section of institutions, based on past tests of the IRF. These scores provide a limited perspective from which to make judgments about the magnitude of scores obtained. Obtained scores toward the upper end of these ranges call for careful investigation by examination of each of the component items to determine whether revisions in conditions and/or policies might be called for to provide better protection for students. Of course, any score above zero provides room and suggestions for improvement.

Table 3

MAXIMUM POSSIBLE IRF SCORES AND SCORE RANGES EXPECTED FROM A CROSS SECTION OF INSTITUTIONS

Topic	Weighted Items	Maximum Score	Expected Range
I	18	1,440	100-400
II	39	840	50-250
III	20	1,090	50-400
IV	6	1,330	0-500
V	11	940	100-400
VI	13	1,625	100-500
VII	8	1.125	125-500
VIII	8	2,140	250-750
IX	14	1,140	100-500
X	6	1,250	0-400
Institution	143	1,130	100-300

Two types of numbers appear on the IRF associated with each item. One type is the small number which appears in each of the response boxes. These are the "weights," or the values assigned to each response. The second type is the italicized number appearing to the left side of each page. This is the "byte" or identification number used for keypunching in computer scoring. It can be ignored in hand scored uses of the form.

Hand Scoring the IRF Data

Probably the easiest procedure for scoring small numbers of forms (less than 50) is by hand. This procedure involves the following steps.

1. Record the number in the checked response box (the "weight") in the space provided for that item in the shaded column to the right of the page.

2. Once step one is completed for all items in a given section, add the numbers and list the total in the space provided at the end of the section. Also write this sum in the "Sum of Weights" column on the Score Sheet at the back of the IRF. Complete step 2 for all ten topics.

3. For each section, go back and add the number of items answered in that section. This should include all answered items, including those for which the weight was 0 (even those for which there was no weight possible above 0). Do not include items checked as "not applicable." Record the total number of items answered in the column provided on the Score Sheet at the back, for all sections.

4. Complete the mathematical steps indicated on the Score Sheet to find each of the Topic Scores and the overall Institution Score. These can then be compared with the range of expected scores listed in Table 3.

Computer Scoring IRF Data

For large numbers of forms, computer scoring is probably faster and more convenient. The data analysis specifications for the IRF have been formulated to accomplish the following steps for each institution or school which is assessed by an IRF: (1) convert the hand marked responses on the IRF into coded, computer processable data; (2) weight these data by computer; (3) print out summary weighted scores for each of the ten topics on the IRF and the overall Institution Score; and (4) provide for the verification of these scores, and their correction in the event of data processing errors.

IRF responses are coded by keytaping or by direct data entry through a remote terminal. Editing can be done either before the IRF's are coded or during the coding operation.

A computer program written in the PL/1 language performs the mechanical operations of taking the coded IRF responses as input and producing the weighted Topic and Institution Scores as output. Individual item responses of particular interest can also be printed out. This printed output is identified according to a school ID number, which can be modified as necessary according to the unique needs of the user. Each school, however, must have some similar unique designator, since the computer program is designed to process a large number of IRF's at one time.

For those wishing to use computer scoring, detailed information regarding the program and its use will be made available. This information includes the specifications and instructions for coding and editing IRF data for input into the computer and details of running the computer program. A meeting with AIR's computer programming staff will be arranged.

Uses of the IRF

Types of Schools for Which the IRF is Appropriate

The IRF is not equally applicable at all postsecondary institutions. It has been designed with certain orientations, and these should be made explicit. Likewise, past field tests have shown the form to be more useful in some settings than in others.

Campus-based programs. The IRF has been designed to detect potential abuse areas primarily in campus-based programs. It has not been validated as a mechanism for detecting problems in nontraditional, off-campus, extension, or correspondence programs or institutions.

Undergraduate emphasis. The primary emphasis of the IRF is on undergraduate programs, especially those which stress occupational and professional preparation. It has not been validated for postgraduate or professional education programs. Past field tests have shown the form to be difficult to use in assessing large, complex graduate universities.

Religious schools. These schools typically have an orientation, purpose, and instructional program which is in many ways unique. The IRF may not be useful in assessing such schools.

Target schools. Certain types of schools and programs have been found to be more likely to cause student consumer problems than others, and it is suggested that the form be focused on this group. Examples of schools for which the IRF is a useful tool include:

- Vocational and technical schools
- Two- and four-year colleges, especially those with occupational and professional preparation orientations
- Proprietary schools and programs
- Out-of-state programs
- Military base schools

It should be noted, in addition, that the IRF can be modified to meet the specific needs of a given state or agency. While the form has been carefully designed and the items on it thoroughly sifted, there is nothing sacrosanct about them. If a given state has laws and regulations which are unique, and it wishes to monitor these, new items and even new topics may be added. Likewise, items and topics may be deleted. The form will be most useful if it meets the precise needs of a state, both in terms of being targeted on the appropriate universe of schools and touching on the most relevant matters with those schools.

Various Schedules of Use

The central use of the IRF is to provide an easy and efficient means of checking an institution on its student consumer protection conditions, policies, and practices. Such checks may be organized in a number of ways.

- The IRF may be used with new institutions applying for licenses or charters, to prevent any problems before they can occur.
- The IRF may be used systematically with all schools undergoing a periodic review. Used this way, it can serve as an early warning system, flagging potential problem institutions for more intense scrutiny.
- The IRF may be used as an additional source of information with those schools which have already been identified as having a problem. Used this way, it can help to spot the source of the problem and point the way toward a solution.
- The IRF can be reused periodically, either as a part of regular reviews or to follow up problem schools, to assess changes in conditions, policies, and practices related to student consumer protection. Past IRF scores and responses can be maintained in a data bank and displayed with each new iteration to provide a clear picture of change over time.

Supplementary Uses and Benefits

One interest of those concerned with student consumer protection is maintaining good communication among various organizations and agencies working in the field. The traditional "triad" of the Federal Government, state agencies, and private accrediting agencies concerned with such matters often operates with little communication among the three partners. The IRF offers one means of improving this communication. It can provide an

"information floor" on the educational consumer protection policies and practices of institutions. To this floor can be added other bits of information which are unique to one or more of the partners but would be useful to the others in making decisions in their sphere of influence. Summary reports could be generated periodically (e.g., yearly) and circulated in compendium form to the other partners in the system. The other partners could update their own records, based on this compendium, for those schools over which they had jurisdiction. An advantage of IRF-type data is that they are relatively objective and standardized in their meaning. There are therefore not dependent on the inconsistent laws, regulations, definitions, and policies of any one partner in the tripartite system.

Another supplementary use of the IRF derives from its usefulness as a tool for institutional self-examination. One of the previous field tests of the form (Dayton & Jung, 1978) was as a part of the reaccreditation process with a cross section of institutions in three regional accrediting agencies. In this tryout, institutions completed the forms themselves and computed their own scores. In a few states, a self-study is required for licensing of an institution. This is usually the case only with degree-granting institutions. Where such a process is required in the course of state mandate approval, the IRF can serve as one element of the self-study process.

References

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APPENDIX C

Categories and Examples of Potentially Abusive
Institutional Policies and Practices

I. Student Recruiting Policies and Practices

A. Institution employs admissions representatives whose compensation or salary is dependent wholly or in part on direct commissions based on number of students enrolled.

B. Institution does not have a written policy governing recruiting and/or admission practices.

C. Written recruiting/admissions policy does not contain:

1. any prohibitions against unethical practices such as the "bait and switch" or the "negative sell";

2. a requirement that all prospective students talk to a representative of the institution at the school prior to enrolling; or

3. a requirement that all enrollees sign an agreement which describes complete costs, payment requirements, and educational services to be provided by the institution.

D. Institution does not provide remedial instruction in basic skills for students who are admitted without meeting stated admissions requirements.

E. Institution uses:

1. advertisements in "help wanted" sections of newspapers, pseudo "Talent" contests;

2. testimonials or endorsements by persons (e.g., actors) who did not attend the institution; or

3. limited time "discounts," to attract enrollees.

F. Advertising of the institution guarantees or implies that completion of an education or training program will lead to employment, or admission to advanced training opportunities.

G. Institution's advertising implies that it:

1. has special ties or connections with employers which it does not in fact have;

2. offers full or partial scholarships when in fact it offers only loans or deferred tuition;

3. has recognized experts on its teaching faculty who in fact have no teaching responsibilities; or

4. offers a "superior" education program when in fact there is no comparative evidence to support the assertion.

II. Disclosure in Written Documents

A. Failure to disclose any of the following in a general catalog, bulletin, or other basic information document:

1. name and address of school.

2. date of publication of the document.

3. school calendar including beginning and ending dates of classes and programs, holidays, and other dates of importance.

4. a statement of institutional philosophy.

5. a brief description of the school's physical facilities.

6. an accurate list of all courses actually offered.

7. an indication of when specific required courses will not be offered.

8. educational content of each course.

9. number of hours of instruction in each course and length of time in hours, weeks or months normally required for its completion.

10. an accurate listing of faculty who currently teach.

11. an indication of the distinction between adjunct or part-time faculty and full-time faculty.

12. policies and procedures regarding acceptability of credits from other institutions.

13. general acceptability by other institutions of credits earned at this institution.

14. requirements for graduation.

15. statement of certificates, diplomas, or degrees awarded upon graduation.

16. data regarding numbers and characteristics of students who drop out.

17. data regarding the employment success of students who complete occupational preparation programs.

18. grading system.

19. policies relating to:

    a. tardiness
    b. absences
    c. make-up work
    d. student conduct
    e. termination
    f. re-entry after termination

20. student fee increases in excess of $50 that are planned within the next year.

21. indications of:

    a. any standard legal limitations or requirements for employment in occupations for which the institution offers courses

    b. lack of institutional specialized or professional course accreditation normally required for post-training employment;

    c. distinctions between institutional accreditation, memberships in professional organizations, specialized program accreditation, State VA-approving agency course approval, and State licensing and approval.

22. description of a grievance procedure students may pursue if they feel they have a valid complaint against the school, a program, or a member of the faculty.

B. In the event any of the following services or facilities are provided, failure to disclose their actual availability and extent:

1. job placement assistance or service.

2. counseling, including for employment, academic, and/or personal problems.

3. dining facilities.

4. housing facilities

5. student parking facilities.

C. In the event the institution offers an educational program which leads to the award of degrees (or which results in credits which are transferable toward the award of degrees), failure to provide accurate descriptions of:

1. recognition by a state agency as meeting established educational standards for granging degrees, if there is such an agency;

2. the scope and sequence of required courses or subject areas in each degree program; and

3. policies and procedures which students must follow to transfer credits within the institution and/or to other institutions.

III. Financial Assistance Information

A. Failure to make available to all current enrollees and applicants written information describing:

1. tuition and fees.

2. books and supplies.

3. estimates of room and board costs.

4. estimates of travel costs for students living in the surrounding community.

5. any additional significant costs.

B. Failure to indicate whether the institution participates in Federally-supported student financial assistance programs, and if it does, failure to indicate:

1. types of programs available.

2. how applications are made.

3. limitations on eligibility for such programs.

4. review standards used in making awards.

5. how the aid is disbursed.

6. person(s) available to assist students in obtaining information regarding student financial assistance programs.

C. For student loan applicants, failure to supply printed documents which disclose:

1. the effective annual loan interest rate.

2. loan repayment obligations.

3. loan repayment procedures.

4. time allowed for repayment.

5. deferment or cancellation provisions, if any.

6. collection procedures which might be applied in the event of failure to repay.

IV. Representation of Current Approved or Accredited Status

A. The institution is currently on suspension, probation, or some other form of limitation or sanction for noncompliance with designated standards by:

1. any local, State, or Federal government agencies.

2. any institutional or professional accreditation agency.

B. The institution fails to publicly disclose to all current enrollees and applicants either A.1 or A.2.

V. Refund Policies and Practices

A. The institution does not have a written refund policy for fees or charges collected or obligated in advance of enrollment or class attendance.

B. The written refund policy is not publicly disseminated to students and prospective students.

C. The written refund policy does not tell students how to obtain refunds.

D. The written refund policy does not provide for at least partial return of student fees or charges based on the amount of instruction the student has had the opportunity to receive.

E. The written refund policy does not specify the maximum time allowed between the receipt of a valid refund request and the issuance of a refund.

VI. Instructional Staff Evaluation and Stability

A. Teaching competence is not included as one criterion in formal salary and/or tenure and/or rank review policies.

B. Evaluations of teaching competence do not include regular, anonymous ratings by students.

C. Instructional staff are repeatedly replaced, in the same sections/courses, after instruction has begun.

VII. Recordkeeping Practices

A. The institution does not maintain the following items in its individual student records:

1. total fees paid by the student.

2. courses taken and completed.

3. academic credits, grades earned.

4. financial aid amounts, including loans, if any, actually received by student and date if his/her receipt.

B. The institution does not have a written policy and actual procedures for maintaining individual student access to records for a period of at least five years following his/her departure from the institution, regardless of the operating status of the institution.

VIII. Occupational/Professional Preparation Programs

A. The institution does not maintain curriculum and equipment advisory committees which include representatives of potential employers in each occupational/professional area for which instruction is offered.

B. The institution does not provide the following, when they are required for employment of graduates in an occupational/professional area:

1. specialized/professional program accreditation.

2. training in the use of basic tools and equipment.

3. internships and/or supervised practice on the job.

4. internships and/or supervised practice in simulated job situations.

5. instruction on topics necessary for state or professional certification of graduates.

C. The institution does not require a biennial review of the relevance and timeliness of occupational/professional curricula.

IX. Career Planning and Placement Services and Follow-Up of Graduates

A. In the event the institution claims to have a job placement service, this service does not include the following aspects:

1. notification of fee charges, if this is the case.

2. formal training in job-seeking and job-holding skills.

3. contacting prospective employers to develop potential jobs.

4. making job interview appointments for individual students, including those seeking part-time employment, and recent graduates.

B. In the event the institution claims to offer career planning assistance, this assistance does not include:

1. professional counseling and career planning.

2. testing to facilitate personal assessment in relation to career opportunities.

3. a resource center which includes information on various career opportunities and educational and training institutions and programs.

C. In the event the institution claims to have a job placement service, the service is confined only to such services as distributing "Help wanted" ads from newspapers or referral to a commercial placement service.

D. The institution does not regularly collect follow-up data on the employment success of former students who did not graduate, recent graduates, and/or longer term graduates.

E. The institution does not annually calculate the rate of student attrition from each identifiable program or curriculum area and does not attempt to determine the reasons for this attrition.

X. Financial Stability

A. If the institution is not publicly-supported, it does not have the following:

1. an endowment or retained earnings fund to pay current operating expenses if they are not covered by student tuition receipts.

2. a reserve of funds sufficient to pay out tuition refunds as students make legitimate requests for them.

B. The institution's financial records and reports are not annually subjected to a certified audit.

C. The institution has debts or other outstanding repayment obligations exceeding $50,000 which are more than 90 days delinquent.